COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Northern Virginia Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Columbia Gas Transmission Corporation
Loudoun Compressor Station
Loudoun County, Virginia
Permit No. NVRO72265

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Columbia Gas Transmission Corporation has applied for a Title V Operating Permit for its natural gas pipeline compressor station in Loudoun County, Virginia. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact:_____ Date:_____

Air Permit Manager:_____ Date:_____

Regional Permit Manager:_____ Date:_____

FACILITY INFORMATION

Permittee
Columbia Gas Transmission Corporation
P.O. Box 1273
Charleston, WV 25325-1273

Facility
Loudoun Compressor Station
Route 860, approximately 2 miles north of U.S. Route 50,
in the vicinity of Gilbert's Corner
Loudoun County, Virginia

AIRS ID No. 51-107-0125

SOURCE DESCRIPTION

SIC 4922 - Natural Gas Transmission. The Loudoun Compressor Station is a natural gas compressor station. Natural gas is received via gas pipelines from an upstream compressor station, compressed, and pumped into outlet pipes for transmissions to a downstream station. The natural gas is compressed using eight Solar Saturn T-1300 turbines, ISO rated at 1,350 horsepower (hp) each, and one Solar Centaur T-4500 turbine, ISO rated at 4,390 hp. All turbines are fired with natural gas. On-site auxiliary equipment includes one generator rated at 221 hp.

The facility is a Title V major source of nitrogen oxides and carbon monoxide. This source is located in an area which is nonattainment for ozone, and attainment for all remaining criteria pollutants. The facility is a major source for the nonattainment new source review program, and a PSD minor source. The facility is currently permitted under two minor NSR permits. The NSR permit governing the operation of the gas turbines was initially issued on August 21, 1990. This permit was superseded with an amended permit issued on February 18, 2000. The NSR permit governing the operation of the auxiliary generator was initially issued on August 31, 1994. This permit was superseded with an amended permit issued on February 18, 2000.

COMPLIANCE STATUS

The facility is inspected once a year. The facility was last inspected on February 26, 1999, and was determined to be in compliance.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION
The emissions units at this facility consist of the following :

Table 1. Significant Emission Units at the Loudoun Compressor Station

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device Description (PCD)	PCD ID	Pollutant Controlled	Applicable Permit Date
06001	E01	Solar Saturn T-1300	21.2 MMBtu/hr[1]	---	---	---	February 18, 2000
06002	E02	Solar Saturn T-1300	21.2 MMBtu/hr[1]	---	---	---	February 18, 2000
06003	E03	Solar Saturn T-1300	21.2 MMBtu/hr[1]	---	---	---	February 18, 2000
06004	E04	Solar Saturn T-1300	21.2 MMBtu/hr[1]	---	---	---	February 18, 2000
06005	E05	Solar Saturn T-1300	21.2 MMBtu/hr[1]	---	---	---	February 18, 2000
06006	E06	Solar Saturn T-1300	21.2 MMBtu/hr[1]	---	---	---	February 18, 2000
06007	E07	Solar Saturn T-1300	21.2 MMBtu/hr[1]	---	---	---	February 18, 2000
06008	E08	Solar Saturn T-1300	21.2 MMBtu/hr[1]	---	---	---	February 18, 2000
06009	E09	Solar Centaur T-4500	58.4 MMBtu/hr[2]	---	---	---	February 18, 2000
060G1	G1	Waukesha F11GSI	221 horsepower	---	---	---	February 18, 2000

NOTES:

[1] The listed rating of the Solar Saturn T-1300 turbines is the rating based on the higher heating value (HHV) heat rate of the fuel and maximum horsepower obtained while operating during periods of low ambient temperatures. The rating of each Solar Saturn T-1300 turbine based on the lower heating value (LHV) heat rate of the fuel at ISO standard conditions (288 ^{o}Kelvin, 60 percent relative humidity, and 101.3 kilopascals pressure) is 14.46 MMBtu/hr.

[2] The listed rating of the Solar Centaur T-4500 turbine is the rating based on the higher heating value (HHV) heat rate of the fuel and maximum horsepower obtained while operating during periods of low ambient temperatures. The rating of the Solar Centaur T-4500 turbine based on LHV heat rate of the fuel at ISO standard conditions is 39.72 MMBtu/hr.

EMISSIONS INVENTORY

A copy of the 1998 annual emission update is attached as Attachment A. Emissions are summarized in the following tables:

Table 2. 1998 Actual Criteria Pollutant Emissions for the Loudoun Compressor Station

	Criteria Pollutant Emission in Tons/Year				
Emission Unit	VOC	CO	SO_2	PM_{10}	NO_x
06001	1.53	4.24	0.09	0.24	2.98
06002	1.63	4.53	0.10	0.25	3.18
06003	0.84	2.32	0.05	0.13	1.63
06004	1.51	4.19	0.09	0.23	2.94
06005	1.51	4.18	0.09	0.23	2.94
06006	1.44	3.99	0.09	0.22	2.80
06007	0.90	2.50	0.06	0.14	1.76
06008	1.15	3.20	0.07	0.18	2.25
06009	1.24	3.46	0.37	0.85	19.4
060G1	0.003	0.50	0.00005	0.002	0.13
Fugitives[1]	6.1	---	---	---	---
Total	**17.8**	**33.1**	**1.0**	**2.5**	**40.0**

[1] Fugitive emissions are included in the calculation for emission inventory submittal and emission fee's. The fugitive emissions from blowdowns, valves, flanges, fittings, etc. are not subject to any other applicable requirements.

Table 3. 1998 Actual Hazardous Air Pollutant Emissions for the Loudoun Compressor Station

Pollutant	Hazardous Air Pollutant Emission in Tons/Year
Formaldehyde	0.35

EMISSION UNIT APPLICABLE REQUIREMENTS - (Combustion Turbines 06001 through 06009)

Limitations

The following limitations are state BACT requirements from the minor NSR permit issued on February 18, 2000. Note that the condition numbers are from Part I - Specific Conditions of the minor NSR permit. A copy of the permit is attached as Attachment B.

Condition 4: NO_x, CO, and VOC emissions from the turbines shall be controlled by equipment design and operation.

Condition 5: The fuel for the turbines shall not contain sulfur in excess of 0.01% by weight.

Condition 6: Limit on fuel consumption for each of the Solar Saturn T-1300 turbines.

Condition 7: Limit on fuel consumption for the Solar Centaur T-4500 turbine.

Condition 8: Limit on the annual operating hours for each turbine.

Condition 9: Emission limits for criteria pollutants for each of the Solar Saturn T-1300 turbines.

Condition 10: Emission limits for criteria pollutants for the Solar Centaur T-4500 turbine.

Condition 11: Visible emission limit of 5% for the turbines.

Condition 13: Establishes natural gas as the approved fuel for the turbines.

Monitoring and Recordkeeping

The monitoring and recordkeeping requirements in Specific Conditions 14, 15, and 16, and General Condition 4 of the NSR permit have been modified to meet Part 70 requirements.

Since the turbines do not have add-on air pollution control equipment, the overall compliance strategy for the facility entails proper operation and maintenance of the gas turbines to achieve compliance with applicable requirements. The permit includes requirements for maintaining records of all emission data and operating parameters necessary to demonstrate compliance. These records include: records of operator training on the proper operation of equipment, records on all scheduled and unscheduled maintenance, records of monthly natural gas consumption (in cubic feet) for each turbine, records of the energy output of the turbines (in hp-

hrs), records of periodic measurements of NO_x, CO, and O_2 concentrations, and sulfur content of the natural gas.

The SO_2 limits contained in the proposed operating permit are based on the limits established in the new source permit for the facility. The SO_2 limits established in the new source permit are based on the allowable sulfur content in the fuel and assumes that all fuel sulfur is emitted as SO_2. Short term SO_2 emission limits are based on the maximum heat input rating of each turbine, while the annual SO_2 emission limits are based on the allowable annual fuel throughput. Compliance with emission limits established for SO_2 is demonstrated by complying with the natural gas sulfur content limit and natural gas throughput limits contained in the permit.

The permittee shall monitor the sulfur content of the natural gas twice per annum during the first and third quarters of each calendar year, and maintain records of the monitoring. Analysis for sulfur content of the natural gas shall be conducted using one of the approved ASTM reference methods for the measurement of sulfur in gaseous fuels. The reference methods are: ASTM D1072-80; ASTM D3031-81; ASTM D3246-81; and ASTM D4084-82 as referenced in 40 CFR 60.335 (b)(2). This fuel sulfur monitoring schedule is established in the minor new source review permit for the facility and was based on the August 14, 1987 policy memorandum from John B. Rasnic, then Chief of the Compliance Monitoring Branch of the U.S. EPA. A copy of the policy memorandum is included as Attachment C.

Emission limits for NO_x, CO, and VOC contained in the operating permit are based on the limits established in the new source permit for the facility. The short term emission limits for the criteria pollutants CO, VOC, and NO_x are based on the turbines operating at maximum capacity during cold ambient temperatures, and taking into account the higher heating value of the fuel. The annual emission limits are based on the operating schedule and natural gas throughput limits contained in the permit. As long as the allowable operating schedule and natural gas throughput limits are not violated, there is very little chance that criteria pollutant emission limits will be violated. Therefore, recordkeeping demonstrating compliance with the operating schedule and natural gas throughput limits practically prohibits the emission units from the ability to exceed the pollutant-specific emission limitations contained in the permit.

Compliance with emission limits established for NO_x, CO, and VOC is achieved through proper operation and maintenance of the turbines, and is demonstrated by the following: (1) maintaining maintenance records for the turbines; (2) complying with natural gas throughput limits for the turbines, and maintaining records of fuel throughput; (3) periodic emissions monitoring for NO_x and CO.

Periodic emissions monitoring will be conducted on the exhaust from each of the turbines to verify that the turbines continue to achieve compliance with short term emission limits through proper operation and maintenance. Emissions monitoring will be conducted at least once each six-month period for the Solar Centaur T-4500 turbine, and at least once each 12-month period for each of the eight Solar Saturn T-1300 turbines. NO_x, CO, and diluent O_2 concentrations will be measured during the periodic testing. The testing will be conducted using procedures approved by the DEQ; these procedures will not necessarily entail use of EPA reference methods. As the purpose of the testing is to provide a reasonable assurance of compliance with emission limits, the testing will likely involve use of portable gas analyzers.

If the periodic testing indicates an exceedance of an emission limit, the permittee is required to take corrective action to correct any equipment which is not operating properly. If corrective action does not eliminate the emissions excursion, the permittee is required to conduct an EPA reference method test in accordance with test methods identified in the permit, or other procedures approved by the DEQ. The reference method testing will be used to determine the compliance status of the turbine(s). It is worth noting that an excursion above an emission standard which is measured using a portable gas analyzer may be considered credible evidence of a violation, however, it does not necessarily establish or correspond to a violation of the permit.

VOC emissions will not be measured during the periodic monitoring events. CO and hydrocarbon emissions both result from the products of incomplete combustion. CO emissions measurements will be used to evaluate overall combustion efficiency of the turbines, and will serve as a surrogate to evaluate VOC emissions.

The new source permit for the facility required a compliance test to evaluate NO_x emissions from the turbines. The initial stack test was performed on February 21, 1991. The results of the testing demonstrated compliance with the limits contained in the permit. Since the turbines are fueled only by pipeline quality natural gas, with no add-on controls, there is no reason to expect the NO_x emissions will increase substantially from those measured during the initial compliance demonstration stack test event. Continued compliance with the limits will be achieved by proper operation and maintenance of the turbines. On-going compliance will be demonstrated by complying with the natural gas throughput limits contained in the permit, and by periodic testing of the turbines.

The Title V permit does not require fuel-bound nitrogen content monitoring as contained in NSPS Subpart GG at 40 CFR 60.334. This has not been included as EPA policy has established that nitrogen monitoring can be waived for pipeline quality natural gas, since there is no fuel-bound nitrogen, and the free nitrogen does not contribute appreciably to NO_x emissions. The August 14, 1987 EPA memorandum from John Rasnic establishing this policy is included as Attachment C.

Pollutant-specific emission factors will be used to calculate annual emissions on a monthly basis for each turbine. The emission factors will be the manufacturer guaranteed emission factors for

the units. These factors were used to establish permit limits, and provide conservative emission estimates in that the emission factors represent the upper limit of the expected range of emissions. The use of these emission factors provides a reasonable assurance of compliance with emission limitations, and underscores that the operational and fuel restrictions are the controlling parameters limiting emissions from the turbines. The periodic measurement of NO_x and CO emissions will serve as a check on the continued representativeness of the manufacturer supplied emission factors. Emissions from the operation of each turbine will be calculated on a monthly basis using the following equation:

$$E_i = EF_i \, x \, O$$

where:

E_i	=	Emissions of pollutant i, lbs/time period
EF_i	=	Emission factor for pollutant i, lbs/hp-hr (manufacturer factors)

Solar Saturn T-1300 Factors	Solar Centaur T-4500 Factors
• 3.44E-03 for NO_x	• 5.19E-03 for NO_x
• 4.89E-03 for CO	• 9.26E-04 for CO
• 1.29E-04 for SO_2	• 9.90E-05 for SO_2
• 1.76E-04 for VOC	• 3.31E-05 for VOC

O	=	Operation and load of turbine, bhp-hrs for time period

The turbines burn pipeline quality natural gas. As long as the turbines are properly maintained and operated, there is very little likelihood that the opacity standards will be violated. This position is supported by the September 15, 1998 EPA memorandum from Eric Schaffer and John Seitz entitled “Periodic Monitoring Guidance for Title V Operating Permits Programs”. Therefore, the permit conditions requiring proper operation and maintenance of the turbines, with associated training and recordkeeping, establish a federally enforceable maintenance program which provides a reasonable assurance of compliance with the opacity standards.

Testing

The permit does not require source emission tests. A table of test methods has been included in the permit if testing is performed. The DEQ and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

No specific reporting has been included in the permit.

Streamlined Requirements

Part I, Specific Condition 12, and Part II, General Condition 2 of the NSR permit require initial compliance testing of the turbines. These conditions have not been included in the Title V permit as the initial compliance testing was performed on February 21, 1991. These requirements have been satisfied and are now considered obsolete.

New source construction and start-up notification requirements in Part II, General Condition 1 have not been included. These notification requirements have been fulfilled rendering this condition obsolete.

Part II, General Condition 8 regarding invalidation of the permit if the facility is not modified and constructed within 18 months from the date of the permit has not been included in the Title V permit.

The combustion turbines have the following applicable requirements established in NSPS Subpart GG, which is included in 9 VAC 5-50-410 by reference:

- § 60.332(a)(2): Standard for Nitrogen Oxides
  where:

$$STD = 0.0150 \frac{(14.4)}{Y} + F$$

STD = Allowable NO_x emissions (percent by volume at 15 percent oxygen and on a dry basis).
Y = Manufacturer's rated heat rate at manufacturer's rated peak load (kilojoules per watt hour), or actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour.
F = NO_x emission allowance for fuel-bound nitrogen as defined in § 60.332 (a)(3)

- § 60.333: Standard for sulfur dioxide:

  $SO_2 \leq 0.015$ percent by volume, dry basis, at 15% O_2, OR, fuel sulfur content $\leq$ 0.8 percent by weight.

The allowable NO_x emission limits for each of the Solar Saturn T-1300 turbines, and the allowable NO_x emission limit for the Solar Centaur T-4500 turbine contained in Part I, Specific Conditions 9 and 10, respectively, of the minor NSR permit are more stringent than the limits established by NSPS Subpart GG. Therefore, only the limits from minor NSR permit have been included in the Title V permit.

Likewise, the fuel sulfur content requirement in Part I, Specific Condition 5 of the NSR permit is more stringent than the standard contained in NSPS Subpart GG. Therefore, only the limit from the minor NSR permit has been included in the Title V permit.

The Loudoun Compressor Station is a major source of NO_x emissions located in the Northern Virginia Ozone Nonattainment Area and is required, at a minimum, to institute Reasonably Available Control Technology (RACT) for the control NO_x emissions. The requirement for NO_x RACT controls is established in 9 VAC 5 Chapter 40, Article 4 of the state regulations. The state RACT regulations were promulgated in response to requirements of the federal Clean Air Act (Section 182) targeted at reducing emissions of nitrogen oxides (NO_X) and volatile organic compounds (VOC) which contribute to the formation of tropospheric (lower atmosphere) ozone.

As of the writing of this federal operating permit and statement of basis, a proposed State Operating Permit implementing NO_x RACT provisions for the Loudoun Compressor Station has been prepared and been through a 30-day public comment period. This proposed permit establishes as RACT the same emission controls and limitations as contained in the State Air Pollution Control Board permit to install, modify, and operate that was initially issued on August 21, 1990 and superseded on February 18, 2000. These controls and limitations were determined to represent the required best available control technology in the initial permit review, and therefore, for emissions of NO_X are no less stringent than RACT. The proposed NO_x RACT emission level from each of the eight (8) Solar, Saturn T-1300 turbines is 76 parts per million, dry volume, corrected to 15 percent oxygen and ISO ambient conditions. The proposed NO_x RACT emission level from the Solar, Centaur T-4500 turbine is 142 parts per million, dry volume, corrected to 15 percent oxygen and ISO ambient conditions. These proposed RACT emission levels are the same as the already established limits for the turbines and are not repeated in the proposed Title V permit as they would be redundant.

Remaining general conditions in Part II of the NSR permit have been modified to meet the general condition requirements of 40 CFR Part 70 and 9 VAC 5-80-10.

EMISSION UNIT APPLICABLE REQUIREMENTS - (Emission Units 060G1)

Limitations

The following limitations are state BACT requirements from the minor NSR permit issued on February 18, 2000. A copy of the permit is attached as Attachment D.

Condition 3: NO_x control requirement by operating generator at appropriate air-to-fuel ratio.

Condition 5: Establishment of natural gas as fuel type for the generator.

Condition 7: Limit on fuel consumption for the generator.

Condition 8: Limit on hours of operation for the generator

Condition 9: Emission limits for NO_x and CO for the auxiliary generator.

Condition 10: Visible emissions limit of 5% for auxiliary generator stack.

Condition 17: Requirement to have written operating procedures for maintaining the generator at a best air-to-fuel ratio and to train operators.

Monitoring and Recordkeeping

The monitoring and recordkeeping requirements in Condition 12 of the NSR permit have been modified to meet Part 70 requirements.

The permit includes requirements for maintaining records of all emission data and operating parameters. These records include yearly natural gas consumption and annual operating hours of the auxiliary generator.

The hourly emission limits established for the auxiliary generator are based on the generator operating at maximum capacity. Therefore, if the generator is operated at capacity, or below, there should not be a violation of the hourly emission rates.

The annual emission limits established for criteria pollutants are based on the natural gas throughput limit and operating hours limit contained in the permit. As long as the natural gas throughput limit and operating hours limit are not violated, there is very little chance that criteria pollutants emission limits will be violated. Therefore, recordkeeping demonstrating compliance with the natural gas throughput limit and operating hours limit can also be used to demonstrate compliance with criteria pollutant emission limits, satisfying the periodic monitoring requirement.

Actual emissions from the operation of the auxiliary generator will be calculated on a monthly

$$E_i = EF_i \, x \, O$$

basis using the following equation:

where:

E_i	=	Emissions of pollutant i, lbs/time period
EF_i	=	Emission factor for pollutant i, lbs/hp-hr (manufacturer factor) • 1.76E-02 for NO_x • 6.72E-02 for CO
O	=	Operation and load of generator, bhp-hrs for time period

There is no monitoring for the visible emission limit. As long as the natural gas-fired generator is properly maintained and operated, there is very little likelihood that the opacity standard will be violated. This position is supported by the September 15, 1998 EPA memorandum from Eric Schaffer and John Seitz entitled "Periodic Monitoring Guidance for Title V Operating Permits Programs". Therefore, the permit conditions requiring proper operation and maintenance of the generator, with associated training and recordkeeping, establish a federally enforceable maintenance program which provides a reasonable assurance of compliance with the opacity standards.

Testing

The permit does not require source emission tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

No specific reporting has been included in the permit.

Streamlined Requirements

The requirement of Condition 4 of the minor NSR permit to replace the then existing 100.5 hp auxiliary generator with the permitted 221 hp auxiliary generator has not been included in the Title V permit. The old generator has been replaced rendering this condition obsolete.

New source construction and start-up notification requirements in Condition 11 of the minor NSR permit have not been included. These notification requirements have been fulfilled rendering this condition obsolete.

Condition 18 regarding invalidation of the permit if the facility is not modified within 18 months from the date of the permit has not been included in the Title V permit.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110, that apply to all Federal operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also

requires notification of deviations from permit requirements or any excess emissions, including those caused by upsets, within one business day.

STATE ONLY APPLICABLE REQUIREMENTS

Columbia Gas Transmission Corporation did not identify any state-only requirements in their application, and all requirements in their minor NSR permits are federally enforceable. Therefore, no state-only requirements have been included in the permit.

FUTURE APPLICABLE REQUIREMENTS

Columbia Gas Transmission Corporation did not identify any future applicable requirements in their application, and the staff are unaware of any applicable requirements that the facility could become subject to during the life of the Title V permit. Therefore, no applicable requirements have been included in the permit.

COMPLIANCE PLAN

Columbia Gas Transmission Corporation is currently in compliance with all applicable requirements. No compliance plan was included in the application or in the permit.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Table 4. Insignificant Emissions Units for the Loudoun Compressor Station

Emission Unit No.	Emission Unit Description	Citation[1] (9 VAC_)	Pollutant(s) Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)

Emission Unit No.	Emission Unit Description	Citation[1] (9 VAC_)	Pollutant(s) Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
Blr2	Boiler #2, Natural Gas-fired Heating System Boiler	9 VAC 5-80-720 C	---	1 MMBtu/hr
A01	Lube Oil Tank	9 VAC 5-80-720 B	VOC	---
A02	Water Mixture Tank #1 (Wastewater)	9 VAC 5-80-720 B	VOC	---
B01	Water Mixture Tank #2 (Wastewater)	9 VAC 5-80-720 B	VOC	---
TP24	Water Mixture Tank #3 (Wastewater)	9 VAC 5-80-720 B	VOC	---

[1]The citation criteria for insignificant activities are as follows:
9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
9 VAC 5-80-720 B - Insignificant due to emission levels
9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. Therefore, all portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit was placed on public notice in the Washington Times from November 12, 1999 to December 12, 1999. The public comment period closed on December 12, 1999. There were no official comments received during this review period. Mr. David Campbell of EPA Region III did request that we include the citation from NSPS Subpart GG for sulfur dioxide and nitrogen oxides requirements. While the NSPS requirements were streamlined with the more stringent NSR permit limits, Mr. Campbell noted that the permit should still acknowledge the federal citations. Therefore, the proposed operating permit submitted to EPA for the 45-day review period established in the State Regulations at 9 VAC 5-80-290 C contained the citations to Subpart GG in 40 CFR 60. No other changes were included in the proposed permit as compared to the draft permit placed on public notice.
The proposed permit was submitted to EPA on December 21, 1999 beginning a 45-day review period. The 45-day review period extended through February 4, 2000. No comments were received from EPA during this review period.

ATTACHMENTS

The following information is attached:

ATTACHMENT A: 1998 Annual Emissions Update

ATTACHMENT B: Minor New Source Review Permit Initially Issued on August 21, 1990 and Superseded on February 18, 2000

ATTACHMENT C: August 14, 1987 EPA Policy Memorandum from John Rasnic

ATTACHMENT D: Minor New Source Review Permit Initially Issued on August 31, 1994 And Superseded on February 18, 2000

ATTACHMENT A

1998 Annual Emissions Update

ATTACHMENT B

Minor New Source Review Permit Initially Issued on August 21, 1990 and Superseded on February 18, 2000

ATTACHMENT C

August 14, 1987 EPA Policy Memorandum from John Rasnic

ATTACHMENT D

Minor New Source Review Permit Initially Issued on August 31, 1994 and Superseded on February 18, 2000